

DANIEL G. BOGDEN
United States Attorney
District of Nevada
BLAINE T. WELSH
Assistant United States Attorney
Nevada Bar. No. 4790
333 Las Vegas Blvd. South, Suite 5000
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Facsimile: (702) 388-6787
Email: Blaine.Welsh@usdoj.gov

DAVID C. SHONKA
Acting General Counsel
NIKHIL SINGHVI
JASON D. SCHALL
HELEN P. WONG
IOANA RUSU
COURTNEY A. ESTEP
THOMAS E. KANE
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mailstop CC-10232
Washington, D.C. 20580
Phone: (202) 326-3480 (Singhvi)
Facsimile: (202) 326-3768
Email: nsinghvi@ftc.gov (Singhvi); jschall@ftc.gov (Schall)
Attorneys for Plaintiff Federal Trade Commission

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMG Services, Inc., et al.,

Defendants, and

Park 269, LLC, et al.,

Relief Defendants.

Case No. 2:12-cv-536

**MOTION FOR ORDER
DIRECTING TURNOVER OF
ASSETS**

On September 30, 2016, the Court entered judgment in the FTC's favor in this proceeding, ordering the Tucker Defendants¹ to pay to the FTC \$1,266,084,156 (plus prejudgment interest), ordering Kim Tucker to pay to the FTC \$19,072,774, and ordering Park 269, LLC to pay to the FTC \$8,000,000. (ECF No. 1057 at 29.)

Currently, several third parties hold assets belonging to the Tucker Defendants and Kim Tucker pursuant to the Court's earlier Asset Freeze Order (ECF No. 960). The list of Scott Tucker's entities whose assets have been frozen by the Court was thereafter twice augmented by the Court. (ECF Nos. 1024, 1030.²)

The FTC respectfully requests that the Court enter the attached order, which would direct third parties to turn over frozen assets to the FTC, in partial settlement of the judgment amounts. (The FTC did not request this relief in its proposed order for summary judgment because there was no asset freeze order in place at the time the summary judgment motion and proposed order for summary judgment were filed).

Dated: October 3, 2016

/s/ Nikhil Singhvi

Nikhil Singhvi
Jason D. Schall
Helen P. Wong
Ioana Rusu
Courtney A. Estep
Thomas E. Kane

*Attorneys for Plaintiff
Federal Trade Commission*

¹ The "Tucker Defendants" are Scott A. Tucker, AMG Capital Management, LLC; Level 5 Motorsports, LLC; Black Creek Capital Corporation; and Broadmoor Capital Partners. (See ECF No. 1057 at 1:10-12.)

² Based on information available to the FTC at this time, the FTC does not seek to collect assets directly from Caribbean Medical Brokers, Inc., Eyeverify LLC, or Think Big Partners LLC.

CERTIFICATE OF SERVICE

I, Nikhil Singhvi, certify that, as indicated below, all parties were served by ECF with the **MOTION FOR ORDER DIRECTING TURNOVER OF ASSETS** filed with the Court.

Von S. Heinz (vheinz@lrrc.com)

Darren J. Lemieux (dlemieux@lrrc.com)

E. Leif Reid (lreid@lrrc.com)

Jeffrey D. Morris (jmorris@berkowitzoliver.com)

Nick J. Kurt (nkurt@berkowitzoliver.com)

Justin C. Griffin (justingriffin@quinnemanuel.com)

Sanford I. Weisburst (sandyweisburst@quinnemanuel.com)

Kathleen Sullivan (kathleensullivan@quinnemanuel.com)

Attorneys for Defendants AMG Capital Management, LLC; Level 5 Motorsports, LLC; LeadFlash Consulting, LLC; Black Creek Capital Corporation; Broadmoor Capital Partners, LLC; Scott A. Tucker; Nereyda M. Tucker, as Executor of the Estate of Blaine A. Tucker

Patrick J. Reilly (preilly@hollandhart.com)

Linda C. McFee (lmcfée@mcdowellrice.com)

Robert Peter Smith (petesmith@mcdowellrice.com)

Attorneys for Relief Defendants Kim C. Tucker and Park 269 LLC

Victoria W. Ni (vni@publicjustice.net)

Craig B. Friedberg (attcbf@cox.net)

Attorneys for Intervenor Americans for Financial Reform

Jeffrey Vanderloop (jvanderloop@madvanlaw.com)

Martin Welsh (mwelsh@lvlaw.com)

Attorneys for Interested Third Parties El Dorado Trailer Sales, LLC and ETS Ventures, LLC

October 3, 2016

/s/ Nikhil Singhvi

Nikhil Singhvi